

UNITED STATES DISTRICT COURT

for the

Southern District of Indiana

United States of America
v.

Jayveon Majors (-01)
Tayveon Majors (-02)

Defendant(s)

Case No.

1:21-mj-00083

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of January 22, 2021 in the county of Marion in the
Southern District of Indiana, the defendant(s) violated:

Code Section

18 U.S.C. § 922 (u)

Offense Description

Theft of Firearms from a Federal Firearms Licensee

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

/s/ Andrew Sullivan

Complainant's signature

Andrew Sullivan, SA ATF

Printed name and title

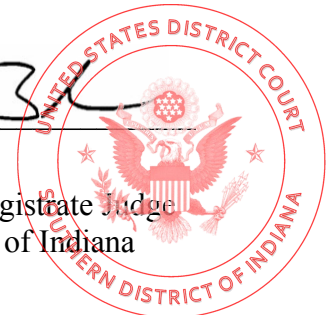
Attested to by the applicant in accordance with the requirements of Fed.R.Crim.P. 4.1 by
telephone (reliable electronic means)

Date: 1/28/2021

Date:

City and state: Indianapolis, Indiana

Tim A. Baker
United States Magistrate Judge
Southern District of Indiana



AFFIDAVIT IN SUPPORT OF AN APPLICATION FOR A CRIMINAL COMPLAINT

Your Affiant, Andrew J. Sullivan, is a Special Agent (SA) with the Bureau of Alcohol, Tobacco, Firearms and Explosives (ATF) and has been so employed since May of 2018. Prior to ATF, your Affiant was employed with the Jackson County Sheriff's Office (MI), for over ten (10) years. Your Affiant spent approximately five (5) of those years assigned to various firearm and narcotics enforcement units, including four (4) years with the Investigations Division; Detective Bureau. Your Affiant has participated in numerous firearms investigations that were prosecuted in both state and federal courts. The information contained in the below numbered paragraphs is either personally known to your Affiant or told to your Affiant by other law enforcement officers.

1. This Affidavit is submitted in support of a criminal complaint charging Jayveon MAJORS and Tayveon MAJORS with knowing theft of firearms from a federal firearms licensee (FFL) in violation of Title 18, United States Code, Section 922(u).
2. On January 22, 2021, at approximately 2:41 a.m. Indianapolis Metropolitan Police Department (IMPD) officers responded to a burglar alarm at 500 Guns, an FFL located at 3602 West Washington Street, Indianapolis, Indiana, in the Southern District of Indiana.
3. When IMPD officers arrived on the scene, they determined a Honda Accord had been used to ram into the side of the building and entry had been made into the business. Officers recovered the vehicle used to ram the building and determined it had been stolen. ATF Industry Operations Investigators (IOIs) responded the scene and conducted a one hundred percent inventory reconciliation with the business owner. IOIs confirmed that 500 Guns is an FFL under ATF License

Number 4-35-097-08-36-02946. IOIs also determined that ten (10) firearms were stolen from the FFL's sales inventory during the burglary:

- a. Smith & Wesson, model 27-2, .357, revolver, serial number N463753
 - b. High Standard, model Sport King, .22, pistol, serial number 446147
 - c. Smith & Wesson, model 28-2, .357, revolver, serial number N572986
 - d. Colt, model Match Target, .22, pistol, serial number 596145
 - e. SDS, Lynx 12, 12 gauge, shotgun, serial number LH014065
 - f. High Standard, model Sport King, .22, pistol, serial number 617616
 - g. Winchester, model 1500, 12 gauge shotgun, serial number NX031412
 - h. Smith & Wesson, model 41, 22LR, pistol, serial number A440305
 - i. Smith & Wesson, model 17-2, .22, revolver, serial number K5645670
 - j. CZ, model American 527, 7.62x39, rifle, serial number C596604
4. Your Affiant has consulted with an ATF firearms interstate nexus expert, who confirmed that none of the ten (10) stolen firearms were manufactured in the State of Indiana.
5. Your Affiant was able to review six (6) different camera views of surveillance video from 500 Guns. The footage shows a suspect driving the stolen Honda Accord and then crashing into the side of the building several times before exiting the vehicle. The suspect in the footage appears to be a light-skinned black male, approximately 5'5" to 5'6" in height and weighing 120-130 pounds, wearing a black sweatshirt with three words stacked vertically in white lettering on the back of the sweatshirt and a bright red/orange nylon style bag around his back. In the footage, the suspect enters the business and begins taking long guns from the display area. The suspect then uses one of the long guns to smash a glass case and remove several handguns. The suspect exits the business via the same hole caused by the Honda Accord ramming the business. The suspect with a bag and hands full of firearms, walks north and appears to make contact with a waiting vehicle.
6. The footage shows the same suspect return to the business, enter briefly, and then exit and return to the waiting vehicle. It appears the suspect was communicating on a cellular phone during this time. The footage also shows a second "getaway"

vehicle pull up next to the crashed Honda Accord. The same suspect who entered the business and was driving the crashed Honda Accord exits from the passenger seat of the vehicle. He appears to use a key fob to unlock the Honda Accord and then opens the driver's side door and retrieves a black metal object consistent with a lug nut wrench from an automobile spare tire kit. The suspect enters the passenger side of the vehicle and appears to place the metal object at his feet. This vehicle turns around and heads north out of sight.

7. On January 22, 2021, at approximately 1:19 a.m., the business owner of 4 Friends Auto Sales located at 3219 W. Washington Street Indianapolis, Indiana, reported to IMPD he was alerted to a motion detection on his surveillance video. The owner further stated he had forgotten to set the alarm system. The owner of the business went on to state that at approximately 4:30 a.m. he was alerted to another motion detection alert at his business. After this alert, the business owner reviewed the surveillance video and determined that a suspect had broken into the business and stolen a vehicle off the lot. The property stolen from 4 Friends Auto Sales included several metal used dealer license plates, a 55-inch flat screen television, and eight (8) vehicle key fobs. A maroon, Honda Accord, with VIN # 1HGCV2F9XJA028059, and no current license plate was also stolen from the business. Investigators were able to review surveillance video from the business. A suspect, described as a light skinned, black male, approximately 5'5" to 5'6" and weighing 120 to 130 pounds is captured on video smashing the glass of the office window. As the suspect enters the building he is holding a black metal object that is consistent in appearance with a lug nut wrench from an automobile spare tire kit. Investigators further observed the male to be wearing a black sweatshirt with three words stacked vertically in white lettering. The male is also wearing

white mitten type gloves, dark pants, and blue calf high combat style boots with blue laces. This stolen vehicle was confirmed to be the one used to ram into 500 Guns.

8. On or about January 25, 2021, investigators from IMPD and the ATF-Indianapolis Field Office began receiving information from anonymous citizens via the tip line. The information that was received states as follows verbatim: “‘Travion’ (phonetic spelling) and his brother had broken into 500 Guns. They used a stolen car to knock a hole in building. Then Travion went inside to get guns. They supposedly have been stealing cars from lots in Indianapolis. Just what I heard.” IMPD and ATF investigators began to follow up on this tip information. S/A Sullivan was able to identify two individuals, Jayveon MAJORS and Tayveon MAJORS, as being involved in previous stolen vehicles reports. Both men (who are twin brothers) also matched the physical description of the suspect that broke into 500 Guns and 4 Friends Auto Sales.
9. On January 26, 2021, ATF Task Force Officer (TFO) Christopher Cooper and your Affiant conducted surveillance on the MAJORS residence located off Sugar Grove Ave., in Indianapolis, Indiana. Investigators believed this to be the residence of both men due to previous arrest reports and court records. TFO Cooper and your Affiant observed a red Mitsubishi, Indiana license plate L665901, parked in front of the residence on the street. After running the plate through the Indiana Bureau of Motor Vehicles (IBMV) the vehicle returned as registered to Tayveon MAJORS.
10. TFO Cooper and your Affiant observed a tow truck pull up and park in front of the Mitsubishi. The Mitsubishi was loaded up onto the wrecker and left the scene. Your Affiant followed the tow truck and eventually flagged it down away from the

residence. The tow truck driver and accompanying male advised that they were repossessing the Mitsubishi for late payment. TFO Cooper and your Affiant followed the wrecker to Lynns Auto Group, located at 2101 Lafayette Road, Indianapolis, Indiana. Once on scene of the car lot the employees of the car lot, without being asked to do so by investigator, opened the doors of the Mitsubishi in order to conduct an inventory and ensure no contraband was inside. TFO Cooper observed on the front passenger floorboard of the Mitsubishi a black lug nut wrench. The employees of the car lot allowed TFO Cooper to photograph the lug nut wrench and take possession of it. Also in the vehicle was mail addressed to Tayveon MAJORS at the same address off Sugar Grove Ave. where officers had conducted surveillance.

11. TFO Cooper applied for and was granted a search warrant from Marion County Superior Court for the residence off Sugar Grove Ave. IMPD SWAT executed this search warrant on January 26, 2021, at approximately 7:50 p.m. and secured the residence. Jayveon MAJORS and Tayveon MAJORS were found inside of the residence.

12. Your Affiant read Jayveon MAJORS his *Miranda* rights from an ATF Advice of Rights Form. J. MAJORS waived his rights and voluntarily agreed to speak with investigators. J. MAJORS admitted to his involvement in the burglary of both 4 Friends Auto Sales and 500 Guns. Specifically, J. MAJORS stated that he had driven his brother's vehicle (the above-described Mitsubishi) to the car dealership where his brother (Tayveon MAJORS) broke in and then stole a car. J. MAJORS then informed your Affiant that he drove his brother's vehicle and followed his brother, who driving the stolen Honda Accord, to the gun store (500 Guns). J. MAJORS said that he acted as the getaway driver as he watched his brother ram

the stolen vehicle into the business then enter and steal the guns. J. MAJORS said he was in communication with his brother via cellular phone during the burglary. J. MAJORS then said that he drove up and picked his brother up after his brother had stolen the guns and placed them in the car. J. MAJORS stated that he pulled up to the stolen car so that his brother could retrieve an item he had left behind. J. MAJORS believed there were a “couple” guns inside of the Sugar Grove residence left from the gun store burglary.

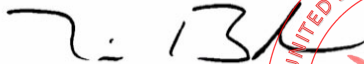
13. Your Affiant also read Tayveon MAJORS his *Miranda* rights from an ATF Advice of Rights Form. T. MAJORS waived his rights and voluntarily agreed to speak with investigators. T. MAJORS admitted to his involvement in the burglary of the auto dealership as well as the gun store. Specifically, T. MAJORS admitted to breaking into the car dealership and stealing license plates, a TV, several key fobs, and a “red Honda”. T. MAJORS then informed your Affiant that he used this stolen vehicle to crash into the gun store and then went into the gun store and stole several guns. T. MAJORS advised it was a spur of the moment decision and he planned on selling the stolen vehicle and the stolen guns. T. MAJORS stated that he believed five (5) or less guns were inside of the residence from the gun store break in. T. MAJORS stated specifically that he believed there were two (2) shot guns and at least two (2) pistols inside of the house.

14. During the execution of the search warrant at the Sugar Grove Avenue residence investigators recovered four (4) firearms that were confirmed by serial number as having had been stolen in the 500 Guns burglary. Investigators also recovered three (3) stolen key fobs, several stolen license plates, a 55-inch TV, and several hundred vehicle documents stolen from several auto dealership burglaries.

/s/ Andrew J. Sullivan
Andrew J. Sullivan
Special Agent, ATF

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by telephone.

Date: 1/28/2021



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